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7 *Attorneys for Defendants*

8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE DISTRICT OF ARIZONA

10
11 Eastern Industries, LLC, a New York
12 limited liability company,

13 Plaintiff,

14 v.

15 EarthCo Enterprises, LLC, an Arizona
16 limited liability company; Thomas Vella
17 and Jane Doe Vella, husband and wife,
18 Wesley Zlotoff and Jane Doe Zlotoff,
19 husband and wife; Dominic Riccobono and
20 Jane Doe Riccobano, husband and wife,
21 and Jack Thomas Riccobono and Jane Roe
22 Riccobono, husband and wife, Scott
23 Williams and Jane Doe Williams, husband
24 and wife,

25 Defendants.

Case No. 2:23-cv-00109

**STIPULATED MOTION FOR
PROTECTIVE ORDER OF
CONFIDENTIALITY**

(Assigned to the Hon. Susan M. Brnovich)

26 Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the undersigned
27 parties stipulate and request that the Court enter a protective order governing the use and
28 disclosure of certain documents in this action. Good cause exists for the entry of a
protective order because certain information subject to disclosure contains sensitive and
confidential information, which is not publicly available, including sensitive business

1 information. Accordingly, the parties hereby stipulate and jointly request that the Court
2 enter the *Stipulated Protective Order of Confidentiality* lodged concurrently herewith.

3 DATED this 30th day of April 2025.

4 **WARNER ANGLE HALLAM**
5 **JACKSON & FORMANEK PLC**

6 By: /s/ Peter J. Foster
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13 By: /s/ Sean A. Woods (with permission)
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15 Sean A. Woods
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18 *Attorneys for Plaintiff*

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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of April 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF filing system, and that on said date copies were delivered electronically via the CM/ECF filing system to:

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